

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

BRUCE HARRIS and ROY
MCCULLUM, Individually and Behalf
of All Others Similarly Situated,
Plaintiffs,

v.

GEORGIA-PACIFIC WOOD
PRODUCTS LLC and GEORGIA-
PACIFIC CONSUMER OPERATIONS
LLC,
Defendants.

CIVIL ACTION
NO. 1:22-cv-02530-TWT

DECLARATION OF JOSH SANFORD

Pursuant to 28 U.S.C. § 1746, Josh Sanford declares, subject to the penalties for perjury, as follows:

1. My name is Josh Sanford, and I am over the age of 18 and duly qualified to execute this Declaration and to swear to the accuracy of the facts herein contained.

2. I am an attorney licensed and in good standing in the State of Arkansas. I practice law with the law firm of Sanford Law Firm, PLLC (hereinafter “Sanford Law Firm”), which is located in Little Rock, which I founded in Russellville in 2001. I opened an office in Little Rock in 2009 and I predominantly practice in the Arkansas District Courts and the Western District of Texas.

3. I practice law full-time, and I manage the other attorneys in the Sanford Law Firm. See “Team,” Sanford Law Firm, <https://www.sanfordlawfirm.com/team/> (last viewed December 11, 2023).

4. In 2005, I was voted “Best Attorney” (tie) in a readers’ poll published by *The Courier* in Russellville, Arkansas. Subsequently, in 2008, I served as the President of the Pope County Bar Association. In addition, I am or have been a member of the American, Arkansas, and Pope County Bar Associations, the Arkansas Trial Lawyers Association and the National Employment Lawyers Association.

5. I am licensed to practice law in all state and federal courts in the States of Arkansas, Colorado and Texas. I am also actively engaged in appellate practice. I have handled cases before almost all county Circuit Courts in the Central and River Valley regions of Arkansas, the United States District Courts for the Eastern and Western Districts of Arkansas, the United States District Courts for the Eastern, Southern, Northern and Western Districts of Texas, United States District Court for the Southern District of Ohio, the United States District Court for the District of Colorado, the United States District Court for the Northern District of Georgia, the United States District Court for the Eastern District of Michigan, the District Court of Nebraska, the United States District Court for the District of Oregon, and the

Fifth, Sixth and Eighth Circuit Courts of Appeals—as well as several other district courts.

6. In the course of my law practice, I engage in a significant amount of wage and hour litigation—specifically cases arising under the Fair Labor Standards Act (“FLSA”) and the comparable Arkansas Minimum Wage Act (“AMWA”). A significant portion of my case load has been in various federal courts around the United States, including trial work in cases arising under Title VII of the Civil Rights Act of 1964, the Equal Pay Act, the FLSA, and the Family and Medical Leave Act.

7. Sanford Law Firm has been recognized as being the premier prosecutor of wage theft violation cases in all federal courts across the United States. <https://unicourt.com/blog/us-district-courts-labor-litigation-2020/> (last visited August 21, 2023).

8. I have been lead counsel on numerous wage and hour cases filed in United States District Courts throughout the nation, including the following: *Jeffery Cagle v. Harmony Group Canton, LLC*, 1:22-cv-2182-LMM (N.D. Ga.); *Jeffery Laird v. Jiya Jeel, LLC, et al.*, 1:22-cv-259-KD (S.D. Ala.); *Craig Lyons, et al. v. Con Agra*, 4:12-cv-245-JM (E.D. Ark.) (over 790 plaintiffs); *Keyli Cruthis, et al. v. Visions, et al.*, 4:12-cv-244-KGB (E.D. Ark.); *James Finley v. Universal Pressure Pumping, Inc.*, SA:12-ca-0654-OG (Western District of Texas); *Michael Alexander*

v. Hahn Appliance Center, Inc., 12-CV-257-CVE-TWL (N.D. Okla.); *Chad Lochridge, et al. v. Lindsey Management, et al.*, 5:12-CV-5047-JLH (W.D. Ark.); *Bill Hollomon, et al. v. AT&T Mobility Services, LLC*, 4:11-cv-600-BRW (E.D. Ark.); *Jeffrey Bacon, et al. v. Eaton Aeroquip, LLC*, 2:11-cv-14103-GD (E.D. Mich.); *Karen “Kay” Roland v. Sharp County Post 336, et al.*, 1:11-CV-85-DPM (E.D. Ark.); *Bennie Watson, et al. v. Surf-Frac Wellhead Equipment Company, Inc.*, 4:11-CV-843 (JLH) (E.D. Ark.); *Robert Terry, et al. v. City of Ola*, 4:11-cv-11-645 (JLH) (E.D. Ark.); *Donald Bateman, et al. v. Frac Tech Services, LLC*, 6:11-cv-708 (E.D. Tex.); *Kalie Brown, et al. v. Barney’s Barn, Inc., d/b/a/ Peaches Gentlemen’s Club*, 4:11-cv-224 (SWW) (E.D. Ark.); *Jason Phillips v. Oil Patch Water and Sewer Services, LLC, et al.*, 4:11-cv-776 (JLH) (E.D. Ark.); *David Delock, et al. v. Securitas Security Services USA, et al.*, 4:11-CV-520 (DPM) (E.D. Ark.); *Karen Springs, et al. v. First Student, Inc.*, 4:11-CV-00240 (BSM) (E.D. Ark.), and many others.

9. Since January of 2015, Sanford Law Firm has filed and prosecuted over 1,100 distinct wage lawsuits throughout Arkansas and Texas. We have also filed cases in Ohio, Kentucky, Tennessee, North Carolina, South Carolina, Florida, Georgia, Alabama, Mississippi, Louisiana, Missouri and Illinois. Many of these

lawsuits are or were group or collective actions, as well as several class actions under Rule 23.

10. Collectively, cases filed by the Sanford Law Firm since 2009 have resulted in more than \$13,000,000.00 in settlements and judgments for wage and hour violations for more than three thousand clients across the nation.

11. For rates appropriate to the Northern District of Georgia, I relied on national surveys and awards in similar cases in the District, supported by the experience of the individual billers.

12. Based on my experience and knowledge, the rates charged by Sanford Law Firm's attorneys, as reflected in the below chart, are reasonable. The rates are reflective of the number of years each attorney has practiced, the attorneys' expertise in employment issues such as the FLSA, the contingent nature of an award of fees, and the rates charged by other attorneys specializing in FLSA work. Consistent with fee orders I have reviewed in this District, no billed staff time is included or requested, other than work performed by paralegals.

13. Individual billing in this case is summarized below:

Billed By	Years in Practice	Rate	Time	Value
Anna Stiritz	31	\$300.00	0.8	\$240.00
Colby Qualls	3	\$150.00	6.1	\$915.00
Courtney Lowery	4	\$190.00	2.6	\$494.00

Daniel Ford	9	\$250.00	2.9	\$725.00
Josh Sanford	22	\$383.00	14.6	\$5,591.80
Karolina Viehe	4	\$200.00	4.5	\$1,800.00
Laura Edmondson	2	\$150.00	35.7	\$5,355.00
Samuel Brown	3	\$150.00	1.8	\$270.00
Stacy Gibson	9	\$250.00	5.3	\$1,325.00
Vanessa Kinney	16	\$300.00	3.8	\$1,140.00
Law Clerk	N/A	\$75.00	1.5	\$112.50
Paralegal	N/A	\$100.00	19.2	\$1,920.00
Grand Total				\$19,888.30

14. Each attorney's hourly rates are supported by their skills and experience, which are described more thoroughly below:

- a. Attorney Anna Stiritz is a 1991 graduate of the University of Arkansas at Little Rock (UALR), William H. Bowen School of Law. Ms. Stiritz received her undergraduate degree from Wheaton College in 1989. Ms. Stiritz initially focused her practice on adoption-related cases as well as dependency-neglect cases in juvenile court, but has since focused her practice on the Sanford Law Firm's employment practice, including an emphasis on assessing employee claims and managing and coordinating with class members in the firm's FLSA-based collective actions.
- b. Attorney Colby Qualls graduated from the University of Central Arkansas ("UCA"), Summa Cum Laude, in 2015 with a B.A. in Political Science and Sociology. After graduating from UCA, he attended the William H. Bowen School of Law and the Clinton School of Public Service to pursue concurrently a law degree and Master of Public Service. While attending law school, he served on the UA Little Rock Law Review Editorial Board and the Bowen Competition Trial Team, and he earned a Top Paper Award, among other classes, in Employment Law. Mr. Qualls was admitted to practice in the State of Arkansas in 2019. Prior to joining Sanford Law Firm, Mr. Qualls clerked for a superior court judge in Anchorage, Alaska. He moved back to Arkansas in early 2020, where he practiced civil litigation in Little Rock. His

practice with Sanford Law Firm focused on employment litigation, particularly the FLSA) and AMWA litigation.

- c. Attorney Courtney Lowery graduated magna cum laude from the University of Arkansas at Little Rock, William H. Bowen School of Law in 2019. She served on the Law Review Editorial Board and was a member of the Student Animal Legal Defense Fund as well as the student chapter of Arkansas Association of Women Lawyers. During law school, Ms. Lowery was a law clerk for the Sanford Law Firm and joined the firm after taking the Arkansas Bar Exam. Ms. Lowery's practice focused heavily on pre-suit screenings and Complaint drafting.
- d. Attorney Daniel Ford graduated summa cum laude from the UALR William H. Bowen School of Law in 2014, graduating sixth in his class. Mr. Ford's practice focuses primarily on employment law, including the FLSA. While attending law school, Mr. Ford was President of Phi Alpha Delta legal fraternity, served on the UALR Law Review and was a member of the Arkansas Journal of Social Change and Public Service, where he published an article on campaign finance reform. Also while attending law school, Mr. Ford had a federal judicial externship with the Honorable Kristine Baker of the District Court for the Eastern District of Arkansas. After graduating law school, Mr. Ford clerked for the Honorable Timothy Fox of the State of Arkansas Pulaski County Circuit Court.
- e. Attorney Karolina Viehe graduated magna cum laude from Valparaiso University School of Law in 2012. Ms. Viehe was an Honors Program Participant. Her practice focuses primarily on employment law, including the FLSA. While attending law school, Ms. Viehe served as the President of Amnesty International Association and was a member of the Intellectual Property Law Association. Also as a law student, Ms. Viehe served as the Judicial Extern for the Honorable Magistrate Judge William G. Hussmann of the U.S. District Court for the Southern District of Indiana and as Certified Legal Intern for the Vanderburgh County Prosecutor's Office.
- f. Attorney Laura Edmondson obtained her law degree from the University of Arkansas School of Law in Fayetteville, Arkansas, graduating Magna Cum Laude in 2021. During her final year in law school, Ms.

Edmondson served as Executive Editor of the Journal of Food Law & Policy, and also clerked at several law firms around Little Rock, including Sanford Law Firm. Ms. Edmondson also volunteered at Legal Aid of Arkansas in Springdale, Arkansas, where she received the Outstanding Volunteer Student Attorney Award in 2020. While at the Sanford Law Firm, Ms. Edmondson's practice focused on employment litigation, particularly the FLSA and AMWA litigation.

- g. Attorney Samuel Brown graduated cum laude from the University of Arkansas at Little Rock, William H. Bowen School of Law in 2020. He joined Sanford Law Firm that fall. During law school, Mr. Brown clerked at several law firms as well as the Arkansas Municipal League. Mr. Brown also completed an externship with the Honorable Magistrate Judge Beth Deere in the Eastern District of Arkansas. Mr. Brown's practice has focused exclusively on employment matters, and largely consists of settlements in wage and hour cases under the FLSA. Mr. Brown capably administers and finalizes several FLSA wage case settlements per week.
- h. Attorney Stacy Gibson graduated cum laude from the University of Arkansas School of Law in 2014. While attending law school, Ms. Gibson was a Note and Comment Editor for the Journal of Food Law & Policy. Ms. Gibson litigated family law, probate, and general civil matters throughout the state before focusing her practice on FLSA cases. She has served as co-counsel on numerous single-plaintiff and collective action FLSA cases in Arkansas district courts and in arbitration, as well as served as lead counsel in a collective action for a group of 189 plaintiffs in the Southern District of Mississippi. She has litigated several FLSA cases for law enforcement officers. Ms. Gibson is a member of the Arkansas Trial Lawyers Association. Ms. Gibson has worked on hundreds of wage cases.
- i. Attorney Vanessa Kinney is a 2007 high honors graduate of the University of Arkansas at Little Rock, William H. Bowen School of Law, graduating eighth in her class. While attending law school, Ms. Kinney was a member of the University of Arkansas at Little Rock Law Review, and had an article published in the Winter of 2006 issue. While attending Law School, Ms. Kinney served in the Law School's

Litigation Clinic under special license to practice law under the supervision of a licensed attorney. During her time at Sanford Law Firm, Ms. Kinney served as both lead attorney and co-counsel on bench and jury trials in both federal and state courts and currently focuses primarily on briefing issues in FLSA cases. Ms. Kinney focused her practice primarily in the area of employment law, particularly the FLSA and AMWA. Ms. Kinney's wage and hour experience dates back to 2010, and she has experience in wage and hour cases from the inception of cases to trial, and all the way through the appeals process. Ms. Kinney worked on hundreds of wage lawsuits and was the primary drafter of briefs and motions that are second to none.

15. The Sanford Law Firm's work focuses on representing workers in employment matters, and its lawyers focus their practices in the area of the FLSA and similar wage-and-hour cases. In the community of attorneys who focus their practice in this area of the law, the Sanford Law Firm has a strong reputation for its quality of work and diligent representation of its clients.

16. The lawyers at the Sanford Law Firm often have opportunities for greater responsibility and experience than many of their peers in the legal community with the same years of experience practicing law. What I mean by this is that because of the management style at the Sanford Law Firm, lesser-experienced attorneys are able to independently manage their own cases with the oversight of more experienced attorneys and are supported by a firm culture of collaboration and accessibility to all Sanford Law Firm attorneys. Lesser-experienced attorneys with Sanford Law Firm find themselves effectively navigating litigation with far more

experienced opposing counsel, as well as successfully taking on far more responsibility than many of their peers of equal experience at other law firms.

17. Sanford Law Firm represented Plaintiff in this case on a contingency basis and paid all out-of-pocket costs, including filing and service fees, without any assurances that fees or costs would be recovered. Not only is there no guarantee that any fees and costs will be recovered in a contingency fee case, but any recovery made will be delayed as compared to clients who make up-front or monthly payments as litigation proceeds. In contingency fee cases, an attorney is not paid for months or even years, depending on how long it takes for litigation to conclude.

18. The request for attorney's fees and costs is based upon contemporaneous time and expense records maintained by Sanford Law Firm as a matter of ordinary and customary business practice.

19. In addition to the time billed to this matter, our firm has also incurred costs of \$402.00, consisting of the filing fee.

**PURSUANT TO 28 U.S.C. § 1746, I VERIFY UNDER PENALTY OF
PERJURY UNDER THE LAWS OF THE UNITED STATES OF AMERICA
THAT THE FOREGOING IS TRUE AND CORRECT.**

Executed on this 12th day of December, 2023.

/s/ Josh Sanford

JOSH SANFORD